

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
DALLAS DIVISION

UNITED STATES OF AMERICA,	:	CASE #3:18-CR-0356-S
	:	
Plaintiff,	:	JUDGE KAREN GREN SCHOLER
	:	
VS.	:	
	:	
THOMAS SELGAS (01)	:	
JOHN GREEN (03)	:	
	:	
Defendants	:	

**Expedited Motion for Permission to Travel**

Defendant Thomas Selgas, through counsel, Charles E. McFarland, and pursuant to the June 6, 2021 Selgas Judgment in a Criminal Case (Doc 302), respectfully moves this Court to grant him permission to travel outside of the Eastern District of Texas to the Northern District Texas. This motion for permission to travel is for four reasons: 1.) to allow Selgas to complete his work-related training in Dallas, Texas; 2.) to fulfill his work-related duties that require him to travel to the Northern District of Texas; 3.) to allow him to visit his medical doctor; and 4.) to allow him to visit his children and grandchildren, who live in the Northern District of Texas. Support for Defendant's motion is set forth in the following Memorandum.

Pursuant to the Local Rule 47.1, counsel for Selgas certifies he attempted to contact the attorney for the United States, Robert Kimens, by e-mail on August 1, 2022 and by telephone on the same day an several time thereafter to determine if the United States would be objecting to this motion for travel. Attorney Kimens has not responded either by e-mail or telephone as of today's date.

### Memorandum

Defendant Selgas was sentenced on June 21, 2021 for the non-violent crimes of income tax evasion and conspiracy to impair the IRS. As part of the Judgment, under the section for Supervised Release, Selgas was ordered at #3 of the Standard Conditions of Supervision (Doc 302, at PageID 4462), “You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the Court or the probation officer.” #7 in the same subsection also requires Selgas to work full time. Selgas requests the Court to grant him permission to travel for the following reasons:

1. When Selgas completed his incarceration and he was assigned to a half-way house. While there he obtained full time work as Maintenance Manager at JetPros, LLC, 151 Skyway Drive, Longview, Texas 75603. During the course of his employment his completed training entitled “Initial Training for Designated Engineering Representatives.” He successfully completed the initial training on July 15, 2022. See attached. In order to become an assigned Designated Engineering Representative for the FAA he must complete his training on August 31, 2002 at the Flight Standards District Offices at 8700 Freeport Parkway, Irving, Texas 75063, near Dallas, which is the Northern District Of Texas;
2. As part of his employment Selgas will sometimes have to travel to the Northern District of Texas to have to travel to Aircraft Security to have devices replaced. Aircraft Security Shop is located at 3570 N. Highway 67, Midlothian, Texas 76065, which is in the Northern District of Texas;
3. Prior to his sentencing Selgas was being treated by urologist Pat Fox Fulgham, M.D. D.A.B.U., Diplomate, American Board of Urology, Fellow, American College of

Surgeons located at Urology Clinics of North Texas, 8230 Walnut Hill Ln, Suite 700, Dallas TX 75231-4482, but was unable to see him for scheduled treatment. Dr. Fulgham is the doctor treating him for further tests. In order to get the treatment required, Selgas needs to be able to travel to Dallas in the Northern District of Texas; and

4. Selgas would like to visit with his children and grandchildren in Waxahachie, Texas 75165, which is also in the Northern District of Texas.

Selgas has contacted his probation officer, which suggested that he obtain permission to travel from the Court for all of these reasons.

Accordingly, Defendant Selgas respectfully requests the Court to grant him permission to travel to the Northern District of Texas, which would allow him to fulfill his employment requirements and visit his children and grandchildren. Defendant further requests the Court to issue a ruling expeditiously as the further training must be completed on August 31, 2022.

Submitted the 4nd day of August, 2022

Respectfully submitted,  
s/ Charles E. McFarland  
Charles E. McFarland Ohio Bar 0031808  
Attorney at Law  
338 Jackson Rd.  
New Castle, Kentucky 40050  
mcfarlandc@bellsouth.net  
Office (502) 845-2754  
Cell (502) 232-5084

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 4, 2022 the foregoing Motion for Permission to Travel was filed using ECF, which will notify all counsel of record.

s/ Charles E. McFarland  
Charles E. McFarland (Ohio Bar 0031808)